

## United States District Court

for the

Southern District of Texas

UNITED STATES OF AMERICA )

V. )

**Jose Angel VALENZUELA** ) Case Number:**San Antonio, Texas** )

)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of **December 23, 2019** in the county of **Webb** in the

(Date)

**Southern**

District of Texas, the defendant(s) violated:

*Code Section*Title 8 United States Code, Section  
1324*Offense Description***Knowing and in reckless disregard of the fact that a certain alien had come to, entered, and remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such alien within the United States, by means of transportation and otherwise, in furtherance of such violation of law.**

This criminal complaint is based on these facts:

See attachment "A".



Continued on the attached sheet.

/s/ Hector Benavides

Complainant's Signature

**Hector Benavides, Special Agent**

Printed Name and Title

Sworn to before me and signed in my presence,

Date: **December 26, 2019**\_\_\_\_\_  
Judge's SignatureCity and State: **Laredo, Texas****Sam Sheldon, U.S. Magistrate Judge**

Printed Name and Title

UNITED STATES OF AMERICA

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V.

Jose Angel VALENZUELA

**[CONT OF BASIS OF COMPLAINT]**

1. On December 23, 2019, at approximately 11:15 p.m., Border Patrol agents (BPAs) assigned to the Freer, Texas, area of responsibility in Webb County, Texas, received a drawbridge camera activation of a white Ford F-250 traveling in a ranch near the Freer United States Border Patrol (USBP) Checkpoint. BPAs expected the white Ford F-250 to exit the Billings Ranch onto FM 2050. Having prior knowledge that smuggling organizations utilize pick-up trucks to blend in with the local traffic, and that FM 2050 is a common route of travel to circumvent the Freer USBP Checkpoint, BPAs staged their vehicles on FM 2050 and waited for the vehicle.

2. A BPA on FM 2050 observed the white Ford F-250 traveling southbound on FM 2050. The BPA noted the white Ford F-250 had brush hanging on the front bumper and had front-end vehicle damage. The vehicle also had several dragged hand prints which were visible on the dirty side panel surface when lights were shined on the passing vehicle. The BPA also noted the white Ford F-250 slowed down as it passed his location as the brake lights flashed several times. The BPA decided to follow the white Ford F-250 and conduct an immigration inspection of the passengers. After traveling approximately six miles, other BPAs arrived at the location. The BPA activated his emergency equipment and the white Ford F-250 failed to yield. After failing to yield for one to two miles, the white Ford F-250 came to a stop. The BPA approached the white Ford F-250 and made contact with the driver who was identified as Jose Angel VALENZUELA. As the BPA was conducting an immigration inspection of VALENZUELA, he noticed two bolt cutters and a crowbar on the passenger side floorboard. The BPA also noticed blankets and a plastic tarp in the bed of the truck which is consistent with human smuggling. VALENZUELA was placed into the BPAs marked unit for safety.

3. During the encounter, the BPA asked VALENZUELA if he needed to have the reason why he was being detained explained to him. VALENZUELA freely stated he had dropped off twelve undocumented aliens (UDAs) as he exited the ranch on FM 2050 when he saw BPA headlights. BPAs went to the location indicated by VALENZUELA and apprehended seven of the twelve UDAs. All subjects were arrested and transported to the Freer USBP Checkpoint for further processing.

4. Homeland Security Investigations (HSI) Special Agents (SAs) responded to the scene and initiated an investigation into the human smuggling event.

5. During a post-Miranda interview, VALENZUELA admitted to knowingly transporting UDAs. VALENZUELA stated he was being paid \$500 per UDA to transport them from Laredo to San Antonio, Texas. VALENZUELA stated the UDAs he was transporting used the bolt cutters and a crow bar to break through ranch road fences to circumvent USBP Checkpoints. Additionally, VALENZUELA stated he was receiving directions and instructions during the human smuggling attempt from his recruiters via two cell phones that were given to him.

6. HSI SAs interviewed material witnesses Yudy SALAZAR-Lemus and Luis LAZO-Lujano. SALAZAR stated he is a national and citizen of Guatemala while LAZO stated he was a national and citizen of Ecuador. Both material witnesses stated they agreed to pay human smuggling fees to be transported into the interior of the United States. Both material witnesses reported they illegally entered the United States by wading the Rio Grande River. SALAZAR stated he illegally entered the United States on December 19, 2019, while LAZO reported he illegally entered the United States on December 16, 2019. Both material witnesses indicated they were picked up in Laredo, Texas, by the person driving the white truck and were covered by a tarp that was in the bed. Neither of the material witnesses were able to identify the driver of the tractor.

[END]